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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BETWEEN THE  
DEBTORS AND THE CALIFORNIA  
PUBLIC UTILITIES COMMISSION  
EXTENDING TIME TO FILE MOTION  
PURSUANT TO FED. R. BANKR. P.  
3018(a) AND AMENDING AMENDED  
ORDER ESTABLISHING SCHEDULE  
FOR DISCLOSURE STATEMENT  
APPROVAL AND PLAN  
CONFIRMATION**

Re: Dkt. No. 5732

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the  
4 “**Chapter 11 Cases**”), and the California Public Utilities Commission (the “**Commission**”). The  
5 Debtors and the Commission are referred to in this Stipulation and Agreement for Order  
6 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as  
7 follows:

8 **RECITALS**

9 A. On February 11, 2020, the United States Bankruptcy Court for the Northern  
10 District of California (the “**Bankruptcy Court**”) entered the *Amended Order Establishing*  
11 *Schedule for Disclosure Statement Approval and Plan Confirmation* [Docket No. 5732] (the  
12 “**Scheduling Order**”)<sup>1</sup>, which, among other things, scheduled the deadline for any creditor to  
13 file a motion pursuant to Bankruptcy Rule 3018(a) seeking to temporarily allow its Claim or  
14 Interest in a different amount for purposes of voting to accept or reject the Plan as March 6,  
15 2020, at 4:00 p.m. (Prevailing Pacific Time).

16 B. Counsel for the Commission has requested, and counsel for the Debtors has  
17 agreed, that the time for the Commission to file a motion pursuant to Bankruptcy Rule 3018(a)  
18 be extended.

19 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
20 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
21 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
22 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
23 **THAT:**

24 1. The time for the Commission to file and serve a motion pursuant to Bankruptcy  
25 Rule 3018(a) is extended through 4:00 p.m. (Prevailing Pacific Time) on March 20, 2020.  
26

27 <sup>1</sup> Capitalized terms used but not otherwise herein defined have the meanings ascribed to such  
28 terms in the Scheduling Order.

[Signature on Next Page]

Dated: March 6, 2020

WEIL, GOTSHAL & MANGES LLP  
KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira  
Dara L. Silveira

*Attorneys for Debtors  
and Debtors in Possession*

Dated: March 6, 2020

CALIFORNIA PUBLIC  
UTILITIES COMMISSION

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